

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
NORTH AMERICAN KARAOKE-WORKS TRADE  
ASSOCIATION, INC.,

Case No.

Plaintiff-Counterclaim  
Defendant,

06-cv-  
5158 (LTS) (MHD)  
-----X  
ECF CASE

-against-

ENTRAL GROUP INTERNATIONAL, LLC,

Defendant-  
Counterclaimant,

-against-

SAM CHAN and RAY YIM,

Counterclaim  
Defendants.

-----X  
DECLARATION OF SAM CHAN

Sam Chan declares as follows:

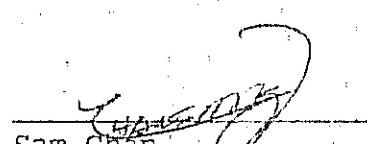
1. I am named as a counterdefendant in this action.
2. I am an officer of the North American Karaoke-works Trade Association, Inc. ("NAKTA").
3. NAKTA is a non-profit professional association for the karaoke industry.
4. I do not receive any compensation for my services to NAKTA, nor do I ever expect to be compensated for those services.
5. In addition to my role in NAKTA, I am a principal in ABC Target Inc. which operates a karaoke club known as Galaxy 45 in New York, New York ("Galaxy").

6. Galaxy is a licensee of Entral Group International, LLC ("EGI").

7. Galaxy does not use NAKTA's library of materials; therefore, I do not receive any monetary benefit from NAKTA's works.

8. I make the foregoing declaration under penalty of perjury.

Dated: New York, New York  
September 25, 2006

  
Sam Chan